



Palo Verde Nuclear  
Generating Station

David Mauldin  
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102-05087-CDM/SAB/RJR

March 10, 2004

EA-03-009

10 CFR 2.202(a)(2)

Mail Station 7605

P.O. Box 52034

Phoenix, AZ 85072-2034

Secretary  
Office of Secretary of the Commission  
U.S. Nuclear Regulatory Commission  
ATTN: Rulemakings and Adjudications Staff  
Washington, DC 20555

Dear Sirs:

**Subject: Palo Verde Nuclear Generating Station (PVNGS)  
Docket Nos. STN 50-528, 50-529 and 50-530  
License Nos. NPF-41, NPF-51 and NPF-74  
20-Day Answer to First Revised NRC Order (EA-03-009)  
Establishing Interim Inspection Requirements for Reactor  
Pressure Vessel Heads at Pressurized Water reactors, Dated  
February 20, 2004**

In accordance with 10 C.F.R. § 2.202(a)(2) and §50.4, Arizona Public Service (APS) Company, hereby submits its answer to the February 20, 2004, First Revised Order (EA-03-009) Modifying Licenses. APS does not request a hearing on the revised Order. APS consents to the Order modifying the licenses as delineated in Section IV of the Order.

No new commitments are being made to the NRC by this letter. However, due to changes in the inspection requirements and responses given to questions asked during the March 2, 2004, meeting on this revised NRC Order, APS is expecting to submit a request for relaxation in support of the U1 2004 spring outage. If you have any questions concerning this matter, please contact Mr. Tom Weber at (623)-393-5764.

Sincerely,

CDM/SAB/RJR/kg

cc:

B. S. Mallet  
M. B. Fields  
N. L. Salgado

U. S. Nuclear Regulatory Commission  
Office of Secretary of the Commission  
20-Day Answer to First Revised NRC Order (EA-03-009) Dated February 20, 2004

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Assistant General Counsel for Materials Litigation (w/attachments)  
and Enforcement  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

ATTN: Document Control Desk (w/attachments)  
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Assistant General Counsel for Materials Litigation (w/attachments)  
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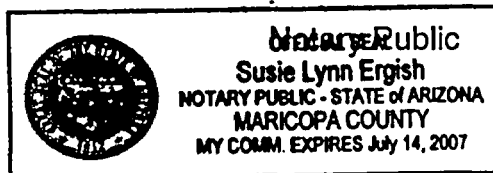
Office of Secretary of the Commission (w/attachments)  
Facsimile Number 301-415-1101

STATE OF ARIZONA       )  
                                      ) ss.  
COUNTY OF MARICOPA   )

I, David Mauldin, represent that I am Vice President Nuclear Engineering and Support, Arizona Public Service Company (APS), that the foregoing document has been signed by me on behalf of APS with full authority to do so, and that to the best of my knowledge and belief, the statements made therein are true and correct.

David Mauldin  
David Mauldin

Sworn To Before Me This 10<sup>th</sup> Day Of March, 2004.



Susie Lynn Ergish

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Notary Commission Stamp